

**THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

CHRISTOPHER DURR,

Plaintiff,

vs.

VERMILION INVESTMENTS, LLC; and
SUKHDARSHAN BEDI,

Defendants.

Case No. 23-cv-5211

Hon.

COMPLAINT AND JURY DEMAND

Introduction

1. This is a housing discrimination case.
2. Vermilion Investments, LLC owns Unit C-108 of the condominium complex located at 200 Willow Lane in Willow Springs, Illinois.
3. Sukhdarshan Bedi manages the unit on Vermilion's behalf.
4. Bedi rented C-108 to Christopher Durr, a black man. Bedi made racist comments to Durr about black people during the tenancy.
5. Durr now sues to recover for his injuries.

Jurisdiction & Venue

6. This court has subject-matter jurisdiction over this case under 28 U.S.C. § 1331 because of Durr's federal Fair Housing Act claim.
7. This court has subject-matter jurisdiction over Durr's remaining claims under 28 U.S.C. § 1337 because they arise from the same facts as his federal claim.

Parties

8. Plaintiff Christopher Durr is a person living in Cook County, Illinois.

9. Defendant Vermilion Investments, LLC is an Illinois limited-liability company, with its principal office on 1010 West Clay Street in Danville, Illinois 61832.

10. Defendant Sukhdarshan Bedi is person living in Will County, Illinois.

Allegations

11. Vermilion is in the residential rental property business.

12. Bedi works for and, on information and belief, is a part-owner of, Vermilion.

13. One of the residential, rental properties owned and managed by Vermilion is Unit C-108, located at 200 Willow Lane, Willow Springs, Illinois.

14. Unit C-108 is a condominium.

15. Before becoming a landlord, Bedi was a medical doctor.

16. Bedi lost his medical license after pleading guilty to federal crimes relating to his medical practice.

17. Bedi pled guilty to obstruction of justice, tampering with a witness, and illegal dispensation of controlled substances. Bedi's medical companies pled guilty to conspiracy to illegally dispense a controlled substance and health care fraud.

18. These pleas took place in 2009

19. After becoming a landlord, Bedi was arrested after entering a tenant's home and taking a photograph of the tenant while the tenant was naked.

20. Christopher Durr is a black man.

21. Long after Bedi's guilty pleas and convictions, Durr rented Unit C-108 from Vermilion and Bedi.

22. Bedi racially abused Durr during the tenancy.

23. Bedi would falsely accuse Durr of gang involvement, drinking, using drugs, playing loud music, and other things, adding that the conduct was typical for black people.

24. Examples of Bedi's racist statements made to Durr during his tenancy include:

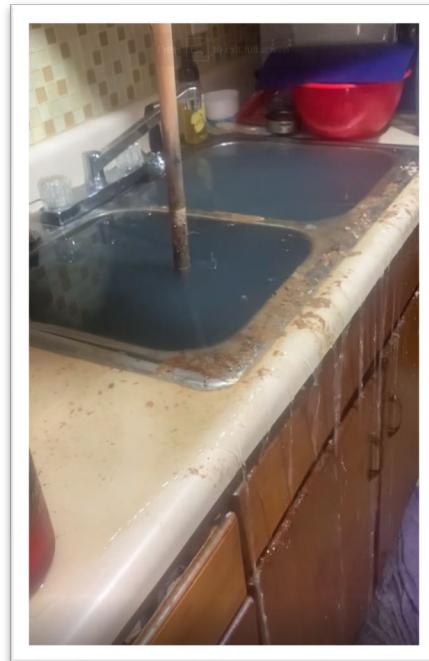
- a. "I think I have a problem with you and many African Americans who do not pay in tile (sic) always not truthful."
- b. "You guys [meaning black people] only know how to cheat and live off of entitlement programs, shame on you."
- c. "You guys [meaning black people] beat up Asians and now you do not pay your rents and bills to Asians."
- d. "You will not understand neither African Americans. They had more opportunities and assistance and representations . . ."
- e. "Blacks are as racist as you are to destroy a Asian man and black criminals hitting, killing, looting Asians and minority businesses."
- f. "[Y]ou are privileged more than whites in this country because all African Americans do not go to jail any more for crimes they commit. And you are doing same but you do not give a damn."
- g. "Mr. Durr did you talk to your uncle, Jessie Jackson, what he thought of you cheating, stealing from businesses .. I wish there was some BLACK leader like Mr. Martin Luther King can be a leader of the BLACKS and his dreams of having these BLACKS do not kill, cheat, steal, pay their rents, do not lie, or beat up innocent American citizens. Mr. Durr. Blacks will destroy this Great country, if they do not have a strong leader."
- h. "America is a sad country and embarrassment in the world because of what African Americans do and other countries sees as blacks beating, looting, killing."
- i. "Mr. Durr, I do not know why of (sic) African Americans do not think right. You never your bills, rent, committing crimes, cheating people, looting stores, street

crimes, I am not afraid of my death by you or other blacks, but you guys should think of hard working people who are losing everything because of crimes committed by African Americans.”

- j. “You all blacks wants free and kill, Rob people.”
- k. “Please get out , you have destroyed me, condo, and worse of all bad name and reputations to black race, this is the reason you all think that you guys are been discriminated, you do bad things and blame others for not treating you fairly.”
- l. “You will not understand neither African Americans. They had more opportunities and assistance and representations, if I was black in America the charges I had, and I pleaded to Obama with my case, he did not care because I was not black , backs are as racist as you are to destroy a Asian man and black criminals hitting, killing, looting Asians and minority businesses. I know you have this job with rail roads because you are African American, you are privileged more than whites in this country because all African Americans do not go to jail any more for crimes they commit. And you are doing same but you do not give a damm.”
- m. “Mr Durr. You have very uncooperative . Do not treat me as a minority Asian to scam me and over power me to cheat and beat me up like many African Americans do to Asians.”
- n. “I am sorry to say that all my eviction case are African Americans who do not pay.”
- o. “Please get out. I cannot baby sit you your responsibilities. It is not racist but you African American thinks that like government , Walmart all land lords should give every thing free.”

p. "Mr Danna my attorney. Have your attorney call him. I will not dare come to your building , you behind African American, i s as m scared of my life coming to the property."

25. Bedi's oral and written racial abuse was compounded by his refusal to promptly address habitability conditions like sewage backing up in the sink of the unit:



26. Vermilion and Bedi's misconduct caused Durr out-of-pocket losses and mental and physical pain and suffering, including bodily injury.

Claims for Relief

Count 1 – Federal Fair Housing Act

Against Vermilion and Bedi

27. Durr incorporates all other allegations here.

28. Bedi injured Durr by committing discriminatory housing practices in violation of the federal Fair Housing Act, including:

- a. Hostile environment housing harassment based on race in violation of 42 U.S.C. §§ 3604(b) & (c) and 24 C.F.R. § 100.600(a)(2); and,
- b. Discriminatory statements in violation of 42 U.S.C. § 3604(c) and 24 C.F.R. § 100.75.

29. Vermilion is vicariously liable for Bedi's discriminatory housing practices. 24 C.F.R. § 100.7(a)(ii) & (b); *Meyer v. Holley*, 537 U.S. 280, 282 (2003).

30. Durr is therefore entitled to injunctive relief, compensatory damages, punitive damages, declaratory relief, attorneys' fees and costs.

Count 1 – Negligence

Against Vermilion Only

31. Durr incorporates all other allegations here.

32. At all relevant times, Bedi acted as Vermilion's agent for its rental business with respect to Durr's tenancy.

33. Vermilion had a legal duty to use reasonable care to hire, train, supervise, and fire its agents to prevent them from discriminating against tenants like Durr.

34. Vermilion breached these duties and, as a result, Bedi discriminated as alleged against Durr.

35. Durr is therefore entitled to compensatory damages and punitive damages.

Prayer for Relief

36. Durr prays for a judgment with the following relief:

- a. Compensatory damages,
- b. Punitive damages,
- c. Attorneys' fees and costs,
- d. Pre- and post- judgment interest,

- e. Injunctive relief,
- f. Declaratory relief, and
- g. All other relief that the court finds just.

Dated: August 8, 2023

Respectfully submitted,

/s/ Thomas R. Kayes

Thomas R. Kayes
THE CIVIL RIGHTS GROUP, LLC
2045 W Grand Ave, Ste B, PMB 62448
Chicago, IL 60612
t. 708.722.2241
tom@civilrightsgroup.com
www.civilrightsgroup.com

Attorneys for Plaintiff

Jury Demand

Durr demands a jury trial.

Dated: August 8, 2023

Respectfully submitted,

/s/ Thomas R. Kayes

Thomas R. Kayes
THE CIVIL RIGHTS GROUP, LLC
2045 W Grand Ave, Ste B, PMB 62448
Chicago, IL 60612
t. 708.722.2241
tom@civilrightsgroup.com
www.civilrightsgroup.com

Attorneys for Plaintiff